

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>CARDWARE INC.,</b>	§	
	§	
<b>Plaintiff,</b>	§	<b>CIVIL ACTION NO. 2:22-cv-00141-JRG-RSP</b>
	§	
<b>v.</b>	§	<b>JURY TRIAL DEMANDED</b>
	§	
<b>SAMSUNG ELECTRONICS CO.,</b>	§	
<b>LTD. AND SAMSUNG</b>	§	
<b>ELECTRONICS AMERICA, INC.,</b>	§	
	§	
<b>Defendants.</b>	§	

**JOINT CLAIM CONSTRUCTION CHART PURSUANT TO P.R. 4-5(D)**

In accordance with P.R. 4-5(d) and the Court's Second Amended Docket Control Order (Dkt. No. 108), Plaintiff CardWare Inc. ("CardWare") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") (together with CardWare, "the Parties") hereby submit the following Joint Claim Construction Chart (Appendix A) that contains the disputed claim terms for United States Patent No. 10,339,520 ("the '520 Patent"), United States Patent No. 10,628,820 ("the '820 Patent"), United States Patent No. 10,810,579 ("the '579 Patent"), United States Patent No. 11,176,538 ("the '538 Patent"), United States Patent No. 11,328,286 ("the '286 Patent"), (collectively, the "Patents-in-suit"), the Parties' respective proposed claim constructions for those terms, and a column for the Court's construction.

Dated: July 18, 2023

Respectfully submitted,

By: /s/ Eric H. Findlay  
Matthew Berkowitz (*pro hac vice*)  
California Bar No. 310426  
Patrick Colsher  
California Bar No. 336958

Navid Bayar  
State Bar No. 24132779  
REICHMAN JORGENSEN LEHMAN & FELDBERG  
LLP  
100 Marine Parkway, Suite 300  
Redwood Shores, CA 94065  
Tel: (650) 623-1401  
Fax: (650) 560-3501  
Email: mberkowitz@reichmanjorgensen.com  
Email: pcolsher@reichmanjorgensen.com  
Email: nbayar@reichmanjorgensen.com

Khue V. Hoang  
New York Bar No. 4131850 (*pro hac vice*)  
REICHMAN JORGENSEN LEHMAN & FELDBERG  
LLP  
400 Madison Avenue, Suite 14D  
New York, New York 10017  
Tel.: (650) 623-1401  
Fax: (650) 560-3501  
Email: khoang@reichmanjorgensen.com

Eric H. Findlay  
State Bar No. 00789668  
Brian Craft  
State Bar No. 04972020  
FINDLAY CRAFT, P.C.  
7270 Crosswater Avenue, Suite B  
Tyler, Texas 75703  
Tel: (903)534-1100  
Fax: (903)534-1137  
Email: efindlay@findlaycraft.com  
Email: bcraft@findlaycraft.com

***Attorneys for Plaintiff CardWare Inc.***

By: /s/ Allan M. Soobert  
Allan M. Soobert  
allansoobert@paulhastings.com  
Kecia Reynolds (*pro hac vice*)  
keciareynolds@paulhastings.com  
David Valente (*pro hac vice*)  
davidvalente@paulhastings.com  
PAUL HASTINGS LLP  
2050 M Street NW

Washington, D.C. 20036  
Telephone: 202-551-1700  
Facsimile: 202-551-1705

Robert Laurenzi  
[robertlaurenzi@paulhastings.com](mailto:robertlaurenzi@paulhastings.com)  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090

Elizabeth L. Brann  
[elizabethbrann@paulhastings.com](mailto:elizabethbrann@paulhastings.com)  
Ariell N. Bratton  
[ariellbratton@paulhastings.com](mailto:ariellbratton@paulhastings.com)  
PAUL HASTINGS LLP  
4747 Executive Drive, 12th Floor  
San Diego, CA 92121  
Telephone: (858) 458-3000  
Facsimile: (858) 458-3005

Melissa R. Smith (TX Bar No. 24001351)  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)  
GILLAM & SMITH, LLP  
303 S. Washington Ave.  
Marshall, TX 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257

***Attorneys for Defendants Samsung  
Electronics Co., Ltd and Samsung  
Electronics America, Inc.***

**CERTIFICATE OF SERVICE**

The undersigned certifies that on July 18, 2023, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document *via* the Court's CM/ECF System.

/s/ Eric H. Findlay  
Eric H. Findlay